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8 5255-3-2-15

9 Attorneys for Defendants and Counter-Defendants  
10 Randall Hough, Bill Goichberg, Bill Hall, Randy Bauer,  
11 Jim Berry, and Karl Kronenberger

12 UNITED STATES DISTRICT COURT

13 NORTHERN DISTRICT OF CALIFORNIA

14 UNITED STATES OF AMERICA CHESS FEDERATION, INC., an Illinois not-for-profit corporation, RANDAL D. HOUGH, an individual

15 ) No. 3:08-cv-05126-MHP

16 ) Plaintiffs,

17 ) DECLARATION OF BILL HALL IN SUPPORT OF THIRD-PARTY DEFENDANTS HOUGH, BAUER, HALL, GOICHBERG, & BERRY 'S MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION

18 ) v.  
19 ) SUSAN POLGAR, an individual, GREGORY ALEXANDER, an individual, and DOES 1-20, inclusive,

20 ) Defendants.

21 ) Date: September 28, 2009

22 ) Time: 10:00 a.m.

23 ) Ctrm: 15, on the 18<sup>th</sup> Floor

24 ) Judge: The Hon. Marilyn Patel

25 ) SUSAN POLGAR

26 ) Counter-Plaintiff,

27 ) v.  
28 ) BILL GOICHBERG, BILL HALL, RANDY BAUER, JIM BERY, KARL KRONENBERGER,

29 ) third party defendants,

30 ) RANDALL HOUGH,

31 ) Counter-Defendant.

32 )  
33 ) No. 3:08-cv-05126 USCF v. Polgar

34 ) Declaration of Bill Hall in Support of Counter-Defendants' 12(b)(2) Motion for Dismissal for Lack of Personal Jurisdiction

1 I, Bill Hall, declare:

2       The following is of my own personal knowledge, unless stated under information and  
3 belief, and if called as a witness I would testify as follows:

- 4       1. I am the Executive Director of the United States Chess Federation ("USCF"),  
5                   and work as a paid employee. The USCF incorporated within Illinois and  
6                   headquartered in the State of Tennessee.
- 7       2. I have resided, as my primary domicile, in Tennessee for the past nine  
8                   consecutive years. I have never resided in California.
- 9       3. I have travelled to California two or three times since 1995 for personal vacation  
10                  or other personal activities. I do not have any personal or business dealings in  
11                  California.
- 12       4. The USCF does not perform any business in California, with the exception of  
13                  dealing with other chess clubs that happen to be located in California and/or  
14                  chess tournaments that are held in California. None of these factors occur more  
15                  in California than the other states.
- 16       5. I have traveled to California about four times in relation to USCF business. Such  
17                  business activities do not occur in California more than any other state  
18                  nationwide. I was not involved in any matters relating to the allegations by  
19                  Polgar at issue which would have put me on notice that I may be subject to suit  
20                  in California

21  
22  
23  
24  
25  
26       I declare under the laws of the Untied States of America that the foregoing is true and  
27                  correct. Executed at Cumberland County, Tennessee, on August 24, 2009.



Bill Hall

## PROOF OF SERVICE

1 5255-3-2-15

2 United States District Court – Northern District of California – Case No.: 3:08-cv-05126-MHP

3 I am a resident of the State of California, over the age of 18 years, and not a party to the  
4 within action. My business address is CESARI, WERNER AND MORIARTY, 360 Post Street,  
5 Fifth Floor, San Francisco, California, 94108. On August 24, 2009, I served the within document:

6 **DECLARATION OF BILL HALL IN SUPPORT OF THIRD-PARTY DEFENDANTS**  
7 **HOUGH, BAUER, HALL, GOICHEBERG, & BERRY'S MOTION TO DISMISS FOR**  
**LACK OF PERSONAL JURISDICTION**

- 8  by transmitting via facsimile the document(s) listed above to the fax number(s) set  
9 forth below on this date before 5:00 p.m.
- 10  by placing the document(s) listed above in a sealed envelope with postage prepaid,  
11 in the United States mail San Francisco, California addressed as follows.
- 12  by causing personal delivery by \_\_\_\_\_ of the document(s) listed above to  
13 the person(s) at the address(es) set forth below.
- 14  by personally hand delivering the document(s) listed above to the person(s) set  
15 forth below.

16 Matt Gonzalez, Esq.  
17 G. Whitney Leigh, Esq.  
18 Matt Springman, Esq.  
19 Gonzalez & Leigh  
Two Shaw Alley, Third Floor  
20 San Francisco, CA 94105

Karl S. Kronenberger, Esq.  
Kronenberger Burgoyne  
150 Post Street, Suite 520  
San Francisco, CA 94108-4707  
(415) 955-1155 (Telephone)  
(415) 955-1158 (Facsimile)

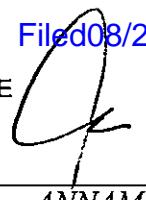
21 Attorneys for Cross-Claimant: Polgar  
22 (415) 512-2000 (Telephone)  
(415) 512-2001 (Facsimile)

23  
24 I am familiar with the firm's practice of processing mail. Under that practice it would be  
25 deposited with the U.S. Postal Service on that day with postage thereon prepaid in the ordinary  
26 course of business. I am aware that on motion of the party served, service is presumed invalid if  
27 postal cancellation date/postage meter date is more than one day after date of deposit for mailing  
28 in affidavit.

I declare under penalty of perjury that the above is true and correct.

Executed on August 24, 2009, at San Francisco, California.

PROOF OF SERVICE

  
\_\_\_\_\_  
*ANAMARIE DAVIS*

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